

February 6, 2008

Mr. Matthew Stuckey, Deputy Branch Chief IDEM, Office of Air Quality 100 North Senate Avenue MC 61-53, Room 1003 Indianapolis, IN 46204-2251

Re: Duke Energy's proposed Edwardsport IGCC Power Plant

Dear Mr. Stuckey,

We, the undersigned members of the City of Bloomington Common Council, urge the Indiana Department of Environmental Management to reconsider its recent decision to grant a permit to Duke Energy for its proposed expansion of the coal power plant at Edwardsport. We feel strongly that Indiana must reduce its reliance on coal-generated power and emphasize instead renewable energy generation and conservation measures. This new policy is urgently needed to stave off the worst effects of global warming while preparing for the inevitable decline in natural gas and oil production. The City of Bloomington has recognized both problems through its resolutions to reduce greenhouse gas emissions and to prepare for the effects of reduced availability of petroleum. We urge the State of Indiana, through IDEM, to encourage our electricity providers to move away from coal and toward renewable energy, starting with its decision on the Duke Energy project at Edwardsport.

We recognize and appreciate Duke Energy's contribution to renewable energy, such as the planned 100MW Benton County windfarm. And we also applaud Duke CEO Jim Rogers' recognition of the imperative of addressing human-induced climate change. However, pursuing a four-fold increase in power generation relying on coal will commit ratepayers to subsidize a facility that will greatly increase greenhouse gas emissions. While it is true that the Integrated Gasification Combined Cycle technology reduces emissions per unit of energy, the scale of the new plant would result in huge increases in greenhouse gas and pollutant emissions, including a 785% increase in CO2. And although removing carbon by sequestration is proposed for the plant, it is not now feasible and perhaps won't be even within decades. The IGCC plant's high cost -- approximately \$2 billion without carbon sequestration -- will also absorb scarce capital, thus making it harder for Indiana rate-payers and government to invest in energy efficiency and renewable sources.

Current analysis from renowned climate scientist James Hansen using data from the Energy Information Agency indicates that combustion of known natural gas and oil are unlikely to exceed the 450 ppm of atmospheric loading1. However, if coal, not facing supply limits, is used in the energy transition to a significant degree, we will most likely surpass this concentration threshold that is recognized as forcing a greater than 1 degree rise in global temperature. This boundary is recognized by the Intergovernmental Panel on Climate Change (IPCC) as important to contain runaway global warming.

¹ Implications of "peak oil" for atmospheric CO2 and climate. P. A. Kharecha, J. E. Hansen (NASA GISS and Columbia University Earth Institute. http://arxiv.org/abs/0704.2782v2

Global climate change is a grave threat to Indiana agriculture, municipal water supplies, natural resources, and human quality of life. We urge that your office respond by discouraging the building and expansion of coal plants, and instead favoring investment in renewable energy development and conservation.

Many states are responding to the threat of global climate change by adopting renewable energy portfolio standards for energy utilities. Carbon taxes may be implemented on the federal level in the near future as well. Indiana may well find itself at a competitive disadvantage relative to other states if we continue to rely on coal as a primary energy source for electricity. Please reconsider your decision on the Edwardsport plant. Thank you.

Most sincerely,

Members of the Bloomington City Council

SUSAN SANDBERG, Council President

STEVE VOLAN, Parliamentarian

DAVE ROLLO, District IV

ANDY RUFF, Council Vice President

CHRIS STURBAUM, District I

ISABEL PIEDMONT, District V